

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



MEMORANDUM

3/27/2020

SUBJECT: Product Chemistry Review for **Raptor 5**, EPA Reg. No.: **4091-22**

FROM: Bruce A Averill *Bruce A. Averill*
Chemistry and Toxicology Team
Product Science Branch
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THRU: Karen P. Hicks, Team Leader *KPH* 04/01/2020
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TO: Jacqueline Hardy, PM Team 34 / Srinivas Gowda
Regulatory Management Branch II
Antimicrobials Division (7510P)

Registrant: W. M. Barr &
Company, Inc.
Action code: 362
Agency Due Date:
4/15/2020
DP No.: 456691
Submission No.: 1045807
E-Sub No.: 46095
Classification: EP
Process: Nonintegrated
system
Pesticide type:
Disinfectant

MRID(s): N/A

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
069142	68424-85-1	Alkyl (C12-C16) dimethyl benzyl ammonium chloride	0.32
069165	32426-11-2	Octyl decyl dimethyl ammonium chloride	0.24
069149	7173-51-5	Didecyl dimethyl ammonium chloride	0.12
069105	5538-94-3	Diocetyl dimethyl ammonium chloride	0.12
021801	77-92-9	Citric acid	2.50
		Other Ingredients	96.7
		Total	100%

I. BACKGROUND

On behalf of the Registrant, W. M. Barr & Company, Inc., Scientific & Regulatory Consultants, Inc., has submitted a minor formulation amendment for their product: Raptor 5, EPA Reg. No. 4091-22. They are seeking approval of a wider pH range.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-35 – Data Matrix	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cover letter (1/16/2020)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Proposed CSF BASIC, (1/14/2020)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF ALTERNATE 1, (1/14/2020)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF ALTERNATE 2, (1/14/2020)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (3/13/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED: CSF	--	
Comments:		

III. FINDINGS

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)			Nominal	Upper limit	Lower limit
Alkyl (C12-C16) dimethyl benzyl ammonium chloride			0.32	0.35	0.29
Octyl decyl dimethyl ammonium chloride			0.24	0.26	0.22
Didecyl dimethyl ammonium chloride			0.12	0.13	0.11
Diocetyl dimethyl ammonium chloride			0.12	0.13	0.11
Citric acid			2.50	2.63	2.38

	YES	NO	N/A
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Wider certified limits were requested and rationale was accepted.	<input type="checkbox"/>	<input type="checkbox"/>	X
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input type="checkbox"/>	<input type="checkbox"/>	X
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. Additional Findings

The CSFs for the revised basic and alternate formulations #1&2 are acceptable. The certified limits for all ingredients agree with 40 CFR §158.350. All ingredients have been cleared for use in pesticide formulations. Percentages on label match composition of product.

V. Conclusion

The registrant has satisfied the CSF requirements for registration of a revised basic and alternate formulations #1&2 of EPA Reg. No. **365-92**. EPA approves said CSFs.